The Honorable BARBARA J. ROTHSTEIN

UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF WASHINGTON AT SEATTLE

AMEENJOHN STANIKZY;

NO. 2:20-cv-00118-BJR

Plaintiff,

PLAINTIFF'S MOTION TO FILE DOCUMENTS UNDER SEAL

PROGRESSIVE DIRECT INSURANCE COMPANY,

Defendant.

COMES NOW the Plaintiff, and pursuant to Local Civil Rule 5(g), respectfully requests

the Court to order sealed from public inspection the following documents:

| Document Name: | Document No.: | Date Filed: |
|---------------------------|----------------------|-------------|
| Declaration of Stephen M. | Dkt #72 | 4/22/2022 |
| Hansen | | |
| Declaration of Scott P. | Dkt #73 | 4/22/2022 |
| Nealey | | |

The basis for the motion to seal is as follows: on June 19, 2020, this Court entered a Protective Order based upon a stipulation of the Parties [Dkt# 32]. The above declarations

MOTION TO FILE UNDER SEAL - 1

Law Offices of
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Tacoma Washington 98402
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| 1 | reference and have attached as exhibits attorney-client information and confidential information | | |
|----|--|--|--|
| 2 | as more specifically described in Mr. Nealy's declaration at paragraph 15. | | |
| 3 | RESPECTFULLY SUBMITTED this 22 nd day of April, 2022. | | |
| 4 | | | |
| 5 | Law Offices of STEPHEN M. HANSEN, P.S. | | |
| 6 | STEPHEN M. HANSEN, WSBA #15642 | | |
| 7 | Of Attorneys for Plaintiff | | |
| 8 | Scott P. Nealey (Pro Hac Vice) | | |
| 9 | Law Office of Scott P. Nealey | | |
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CERTIFICATE OF SERVICE

The undersigned certifies, under penalty of perjury under the laws of the State of Washington, that on April 22, 2022, I electronically filed the above and foregoing document with the Clerk of the Court using the CM/ECF system, which will automatically send notification of such filing to all counsel of record.

Ara B. WALKER, Legal Assistant

MOTION TO FILE UNDER SEAL - 3

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